

TAYLOR, COLICCHIO & SILVERMAN, LLP

PAUL C, TAYLOR
PHILIP M. COLICCHIO†*
THOMAS P, WILD†
ELLEN NUNNO CORBO
STEPHEN J. TAYLOR†*
ROBERT W. KEDDIE, III†
SEAN J. KEARNEY†
REGAN C. KENYON JR.

OF COUNSEL

JEFFREY S. ADLER

STEPHAN G. BACHELDER

STEPHEN B., SILVERMAN

COUNSELLORS AT LAW
502 CARNEGIE CENTER
SUITE 103
PRINCETON, NEW JERSEY 08540

(609) 987-0022 FAX: (609) 987-0070

WWW.TCSLAWYERS.COM

PLEASE REPLY TO PRINCETON

NEW YORK OFFICE: 1350 BROADWAY SUITE | 100 NEW YORK, NY 10018 212-681-1700 FAX: 212-681-5060

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- * ALSO ADMITTED IN NY
- * CERTIFIED CRIMINAL ATTORNEY N.I

March 17, 2010

Via Electronic Filing

The Honorable Peter G. Sheridan, U.S.D.J. Clarkson S. Fischer Building U.S. Courthouse Room 7000 402 East State Street Trenton, New Jersey 08608

ATED: 3/18/10

Time to answer or otherwise

were is inchester April 30, 20,

Re: Church Towers Urban Renewal Corporation v. Hoclo Capital Group, Inc., et al. Docket No.:2:10-cy-00638

Dear Judge Sheridan:

This firm represents the interests of Defendant, Federal National Mortgage Association d/b/a Fannie Mae ("Fannie Mae") related to the above matter. The following is an application/request by Fannie Mae for an Order Extending Time or Otherwise move as to the Complaint.

Good cause exists for granting this request. No prior extensions have been sought by Fannie Mae. Moreover, Plaintiff's counsel has consented. The Complaint in this matter was served on Fannie Mae in its Washington, DC office on February 17, 2010 and an initial pleading was due to be filed on or before March 9, 2010. Fannie Mae engaged New Jersey counsel in a timely manner but its initial counsel was conflicted out of the case last week before it could secure an extension of time under L.Civ.R. 6.1(b) or from Plaintiff's counsel. This firm was engaged this week and has reached out to Plaintiff's counsel who consented to a request for an extension of time until April 30, 2010 to file a response. Such an extension will not prejudice or delay this matter in any way. The complaint was filed on February 2, 2010. There are approximately fifteen (15) Defendants in the matter and service is, in all likelihood, still ongoing as to some of the Defendants. No initial conference has been scheduled.

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COUNSELLORS AT LAW

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To that end, if the enclosed Stipulation and Order meets with your Honor's approval, kindly execute where indicated and have your chambers file on the Court's docket.

Please contact my office if you have any questions or concerns. Thank you for your consideration in this regard.

Respectfully dubmitted,

Philip M. Colicchio

enc.

ce: Bennet D. Zurofsky (via electronic filing and facsimile) Gary Fox, Esq. (via electronic filing and facsimile)